

WHEREAS, Carvana timely filed a notice of removal of this action from the Court of Common Pleas, Philadelphia County, Pennsylvania to the United States District Court for the Eastern District of Pennsylvania on June 28, 2022 (ECF 1);

WHEREAS, on July 1, 2022, Plaintiff and Carvana jointly submitted a Proposed Stipulated Scheduling Order proposing a deadline for Carvana to move to compel arbitration on a non-class basis and/or otherwise respond to the complaint of thirty (30) days after the later of (i) the deadline for Plaintiff to move to remand this action on the basis of any defect other than lack of subject matter jurisdiction or (ii) the Court's issuance of a decision on a motion to remand, if one is filed (ECF 4);

WHEREAS, the Court adopted the Proposed Stipulated Scheduling Order on July 7, 2022 (ECF 7);

WHEREAS, Carvana timely moved to compel arbitration on a non-class basis and to dismiss on August 29, 2022 (ECF 10);

WHEREAS, pursuant to the Eastern District of Pennsylvania's Rule of Civil Procedure 7.1(c), the current deadline for Plaintiff to respond to Carvana's Motion to Compel Arbitration and to Dismiss is fourteen (14) days after service of the motion, or September 12, 2022;

WHEREAS, pursuant to the Court's Notice to Counsel on Pretrial and Trial Procedures, Carvana's deadline to file a reply is within seven (7) days following receipt of the responding party's papers, or September 19, 2022;

WHEREAS, Plaintiff intends to file a response to Carvana's Motion to Compel Arbitration and to Dismiss;

WHEREAS, Carvana intends to file a reply to its Motion to Compel Arbitration and to Dismiss;

WHEREAS Plaintiff is currently evaluating her positions with respect to Carvana's Motion to Compel Arbitration and to Dismiss;

WHEREAS, given the important and dispositive nature of Carvana's Motion to Compel Arbitration and to Dismiss, the parties respectfully request that the Court extend the deadline for Plaintiff's response by forty-five (45) days to October 27, 2022, and extend the deadline for Carvana's reply by thirty (30) days to November 3, 2022;

WHEREAS, no party will be prejudiced by this extension, and both parties have agreed to this motion for extension of time and believe that it is in the interests of judicial economy and efficiency;

WHEREFORE, Plaintiff and Carvana respectfully request that the Court grant this Joint Motion for an Extension of Time, extend Plaintiff Tajae Bradley's time to respond to Defendant Carvana, LLC's Motion to Compel Arbitration and to Dismiss to October 27, 2022, and extend Defendant Carvana, LLC's time to reply to November 3, 2022. The parties further request such other relief as the Court deems just.

Dated: September 9, 2022

Respectfully submitted,

/s/ Kevin W. Tucker

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Dated: September 9, 2022

Respectfully submitted,

/s/ Paul G. Gagne (with consent)

Paul G. Gagne, one of the Attorneys for
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IT IS SO ORDERED this ____ day of September, 2022

Hon. Michael M Baylson
United States District Judge